



SOWELL GRAY STEPP & LAFFITTE, LLC  
ATTORNEYS AND COUNSELORS AT LAW

December 3, 2003

VIA HAND DELIVERY

The Honorable Bruce Duke  
Acting Executive Director  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: Intervention in Docket No. 2003-326-C  
SGS&L File No. 5668/1500

Dear Mr. Duke:

Enclosed for filing, please find the originals and 15 copies of Momentum Business Solutions' Petition to Intervene in the referenced Docket. By copy of this correspondence I am serving the same on parties of interest. Please stamp the extra copies provided as proof of filing and return them to our courier.

Sincerely,



Robert E. Tyson, Jr.

Robert E. Tyson, Jr.  
rtyson@sowell.com

/alh

Enclosures

cc: Sent via email  
F. David Butler, General Counsel  
Florence P. Belser, Executive Assistant to Commissioners  
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**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

Docket No. 2003-326-C

IN RE:

Analysis of Continued Availability of	)	<b>MOMENTUM BUSINESS</b>
Unbundled Local Switching for Mass	)	<b>SOLUTIONS, INC.'S</b>
Market Customers Pursuant to the Federal	)	<b>PETITION TO INTERVENE IN</b>
Communication Commission's Triennial	)	<b>DOCKET NO. 2003-326-C</b>
Review Order	)	
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Pursuant to Rule 103-836 of the Regulations of the Public Service Commission of South Carolina ("Commission"), Momentum Business Solutions, Inc. ("Momentum") submits its petition to intervene in the above-captioned Docket Number 2003-326-C. In support hereof, Momentum shows as follows:

1. Momentum is a telecommunications company duly organized and existing under the laws of the State of Delaware with its principal place of business in Alabama. Momentum, a competitive local exchange carrier, provides telecommunications services to customers throughout the State of South Carolina.

2. The legal name and address of Momentum are as follows:

Momentum Business Solutions, Inc.  
2090 Columbiana Road, Suite 3000  
Birmingham, Alabama 35216

3. The full name and address of the authorized representative of Momentum are as follows:

Robert E. Tyson, Jr., Esquire  
Sowell Gray Stepp & Laffitte, LLC  
1310 Gadsden Street  
Columbia, South Carolina 29201

4. On November 7, 2003 the Commission issued Order No. 2003-667 setting hearing dates and opening dockets for the state proceedings required by the Federal Communications Commission ("FCC") in its Triennial Review Order of Section 251 unbundling obligations of Incumbent Local Exchange Carriers ("TRO").

5. Momentum has an interest in the instant proceeding because the Commission's ruling will affect Momentum's telecommunications services to its customers in South Carolina.

6. As a provider of these telecommunications services, Momentum's interests are not adequately represented by any other party to this proceeding. Accordingly, Momentum requests that it be permitted to intervene in this proceeding in order to protect its interest.

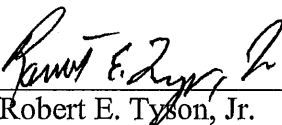
7. The position of Momentum in this proceeding is to assist the Commission in its fact-finding role to determine whether impairment exists in South Carolina.

8. Momentum is informed and believes that granting its request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing the views and concerns of Momentum can be developed.

WHEREFORE, for the foregoing reasons, Momentum respectfully submits its intervention in the above-captioned Docket Number 2003-326-C and requests that it be permitted to participate therein with full rights as a party.

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

By: \_\_\_\_\_



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Attorneys for Momentum Business Solutions, Inc.

Columbia, South Carolina

December 3, 2003

**CERTIFICATE OF SERVICE**

I, the undersigned paralegal of the law offices of Sowell Gray Stepp & Laffitte, L.L.C., attorneys for Momentum Business Solutions, Inc., do hereby certify that I have served a copy of the pleading(s) hereinbelow specified via e-mail to the following address(es):

**Pleadings:**     **Momentum Business Solutions, Inc.'s Petition to Intervene in Docket No. 2003-326-C**

**Counsel Served:**

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**South Carolina Department of Consumer Affairs**  
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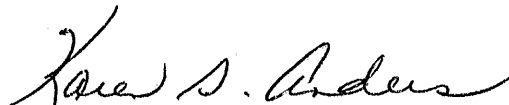
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Litigation Paralegal

December 3, 2003